



Food and Drug Administration  
10903 New Hampshire Avenue  
Document Control Center – WO66-G609  
Silver Spring, MD 20993-0002

September 12, 2014

CAO Group Incorporated  
Mr. Robert K. Larsen  
Regulatory Affairs Manager  
4628 West Skyhawk Drive  
West Jordan, Utah 84084

Re: K142225

Trade/Device Name: Pilot Elite Diode Laser  
Regulation Number: 21 CFR 878.4810  
Regulation Name: Laser surgical instrument for use in general  
and plastic surgery and in dermatology  
Regulatory Class: Class II  
Product Code: GEX  
Dated: August 4, 2014  
Received: August 13, 2014

Dear Mr. Larsen:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you; however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21

CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

<http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to

<http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address

<http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,

**David Krause -S**

for Binita S. Ashar, M.D., M.B.A., F.A.C.S.  
Director  
Division of Surgical Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known)

K142225

Device Name

Pilot Elite Diode Laser

Indications for Use (Describe)

The Pilot Elite Diode Laser is indicated for dentistry and oral soft tissue procedures of:

- 1) The removal of lesions, excision, incision, vaporization, ablation, hemostasis, and photocoagulation on soft tissue including abscess treatment, contouring, curettage, sulcular debridement, pulpotomy, frenectomy, gingivectomy, troughing, and removal of inflamed edematous tissue.
- 2) Temporary relief of minor muscle and joint pain, stiffness, minor arthritis pain, muscle spasm, temporary increase in local blood circulation, and temporary relaxation of muscles by means of topical elevated tissue temperature from infrared spectral emissions;
- 3) Light activation of bleaching materials for teeth whitening and laser-assisted whitening/bleaching of teeth.

Type of Use (Select one or both, as applicable)

☒ Prescription Use (Part 21 CFR 801 Subpart D)

☐ Over-The-Counter Use (21 CFR 801 Subpart C)

**PLEASE DO NOT WRITE BELOW THIS LINE – CONTINUE ON A SEPARATE PAGE IF NEEDED.**

### FOR FDA USE ONLY

Concurrence of Center for Devices and Radiological Health (CDRH) (Signature)

This section applies only to requirements of the Paperwork Reduction Act of 1995.

**\*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.\***

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## 510(k) Summary of Safety and Effectiveness

CAO Group, Inc.  
4628 West Skyhawk Drive  
West Jordan, UT 84084  
Tel: 801-256-9282 Fax: 801-256-9287

Prepared By: Robert K. Larsen,  
Preparation Date: August 5, 2014

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### Device Name:

<u>Trade Name:</u>	Pilot Elite Diode Laser
<u>Common Name:</u>	Soft Tissue Diode Laser
<u>Product Classification:</u>	Powered Laser Surgical Instrument

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### Legally Marketed Predicate Devices for Substantial Equivalence:

Pioneer Elite Diode Laser, manufactured by CAO Group, Inc. (K131059)

### Rationale for Substantial Equivalence:

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The aforementioned device has identical indications for use with that of the present device for excision, incision, ablation, photocoagulation, and infrared heating of tissue for temporary pain relief on soft tissue for a variety of procedures in dentistry. These devices also have an identical indication for a light source to activate tooth whitening materials and assist in tooth whitening procedures. The predicate device and submitted device have identical performance features including wavelength, power output, energy type, operating controls, and laser delivery method. The devices have identical methods of disinfection and sterilization. The devices have identical methods of control systems, safety features, and performance monitoring.

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### Description of Submitted Device:

The Pilot Elite Diode Laser is a device for delivering laser energy to human soft tissue for a variety of surgical procedures and treatments. This energy is generated by solid-state diodes, which provide a consistent and reliable generation of laser energy at  $810 \pm 20\text{nm}$  for a maximum of 3 watts of energy output. The laser energy is delivered to the surgical site by means of an optical fiber system, which allows for the safe transmission of laser energy to the site without creating undue risk to the patient or operator staff by errant or collateral laser emissions. The device features some user definable settings, including a switchable 630nm aiming beam,

adjustable power output for both the working beam and aiming beam, and continuous delivery or pulse delivery options.

The working end of the delivery fiber is contained within a metal handpiece with a disposable single-use tip. This handpiece system is incorporated into the device. The activation of the working beam diodes is completed by use of a foot-actuated switch.

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### **Intended Uses of the Submitted Device:**

The Pilot Elite Diode Laser is indicated for dentistry and oral soft tissue procedures of:

- 1) The removal of lesions, excision, incision, vaporization, ablation, hemostasis, and photocoagulation on soft tissue including abscess treatment, contouring, curettage, sulcular debridement, pulpotomy, frenectomy, gingivectomy, troughing, and removal of inflamed edematous tissue.
  - 2) Temporary relief of minor muscle and joint pain, stiffness, minor arthritis pain, muscle spasm, temporary increase in local blood circulation, and temporary relaxation of muscles by means of topical elevated tissue temperature from infrared spectral emissions;
  - 3) Light activation of bleaching materials for teeth whitening and laser-assisted whitening/bleaching of teeth.
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### **Technological Characteristics and Substantial Equivalence:**

The Pioneer Elite Diode Laser is a device for delivering laser energy to human soft tissue for a variety of surgical procedures and treatments. This energy is generated by solid-state diodes, which provide a consistent and reliable generation of laser energy at  $810 \pm 20\text{nm}$  for a maximum of 3 watts of energy output. The laser energy is delivered to surgical site by means of an optical fiber system, which allows for the safe transmission of laser energy to the site without creating undue risk to the patient or operator staff by errant or collateral laser emissions. The device features some user definable settings, including a switchable 630nm aiming beam, adjustable power output for both the working beam and aiming beam, and continuous delivery or pulse delivery options.

The working end of the delivery fiber is contained within a metal handpiece with a disposable single-use tip. This handpiece system is incorporated into the device. The activation of the working beam diodes is completed by use of a foot-actuated switch.

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### **Conformity to Standards:**

The Precise SHP Diode Laser is designed to comply with the performance requirements of 21 CFR 1040.10 and 1040.11, with permissible deviations relative to Laser Notice 50, dated June 24, 2007. The device also complies with the recognized standards of IEC 60601-2-22

Edition 2 and IEC 60825-1 Edition 1.2. The device is designed in compliance to the entirety of IEC 60601-1: 2<sup>nd</sup> Edition, IEC 60601-1-2, and IEC 60601-1-4.

## **Performance Data**

Bench testing on an evaluation sample of the current device revealed that the device met the design criteria for essential performance, and satisfied the performance requirements indicated in 21 CFR 1010 and 21 CFR 1040. Device outputs were within performance requirements and all safety features and functions were operating correctly.

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## **Conclusion**

The Pilot Elite Diode Laser is substantially equivalent to the listed predicate device without raising any new issues of safety or effectiveness. This device shares similar intended uses, operating principles, design features, and functional and performance characteristics. The device is designed to comply with relevant federal and international safety and performance standards.